8300 A. and avenue post office box 354 st. louis, missouri 63166 U.S.A. (314) 854-4000 telex: 44-7427



May 20, 1983

Ms. Betti Harris Waste Management Branch U. S. E. P. A. 324 East Eleventh Street Kansas City, MO 64106

Dear Ms. Harris:

RE: Company Participation in RCRA

R00307899
RCRA RECORDS CENTER

This letter is in response to Chief Morby's correspondence asking for clarification of Brown Shoe Company's facilities' activities in hazardous waste. His summary was only partially correct.

- 1. The St. Louis facility number MOT300010956 has been closed and this number has been removed from your records. I believe this was a generator number assigned to a rented trucking facility.
- 2. The following facilities continue as generators: MOD006281075 - Steelville, MO Need new number assigned - Benton, MO (see below)
- 3. The Ironton location (MOD006316632) and Union location (MOT094391810) should both be listed as small quantity generators as far as EPA is concerned.
- 4. The transfer dock facility and chemical manufacturing formerly located at 4327 Gustine, St. Louis and numbered MOD000822585 has moved to Box 9A, Route #1, Benton MO 63736.

Since Chief Morby stated identification numbers are assigned to addresses rather than the firm, we need a new number assigned to Benton, MO location.

Benton acts as a generator for all our small quantity generators and is a transfer dock and chemical manufacturing facility. All hazardous waste from all Brown Shoe locations is shipped into Benton on the 3rd Monday of our fiscal month, where it is inspected, logged, and assimilated into one trailer for disposal to permitted facilities.

EPA-ARWM/SPRS

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Benton retains generator copies of the Illinois manifests covering the disposal of these wastes, but transporter copies are kept in our Traffic Department here in the home office.

We feel that probably the transporter number should be assigned to the home office address of 8300 Maryland, St. Louis, since that is where the transporter copies of the manifest and our Traffic Department are located.

If different forms need to be filled out or more classification or discussion is needed about Brown Shoe Company's Waste Management Program, please feel free to contact me.

Sincerely yours,

Gerald C. LaMotte III

G. C. Lamatte III

kf Enclosure